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July 13, 2021

By ECF
Honorable Edgardo Ramos
U.S. District Judge
Southern District of New York
40 Foley Square
New York, N.Y. 10007

The July 16 status conference is adjourned to August 20, 2021 at 10:00 a.m. Speedy trial time is excluded from July 16, 2021 until August 20, 2021, in the interest of justice.

SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 7/15/2021
New York, New York

Re: United States v. Angela Rodriguez
20 Cr. 39 (ER)

Dear Judge Ramos:

MEMO ENDORSED

I represent defendant Angela Rodriguez in the above-referenced matter. A status conference is scheduled for this Friday, July 16, 2021 at 11:30 a.m. For the reasons which follow, the defense writes now to respectfully request that the conference be adjourned for at least 30-days.

The defense has spent considerable time reviewing the discovery in this case and meeting with Ms. Rodriguez in person. After consultation with Pretrial services, it is our belief that Ms. Rodriguez would be an excellent candidate for the Southern District's Young Adult Opportunity Program ("*the Program*"). According to the Court's website, the Young Adult Opportunity program "provides selected young adult defendants with intensive supervision by Pretrial Services and regular interaction with the supervising federal judges." (See <https://www.nysd.uscourts.gov/programs/young-adult-opportunity-program> See also YAOP Report attached hereto).

Applicants to the Program are required to submit among other things, a summary of the defendant's relevant family, educational, and employment history as well as any other information which is "relevant to the applicant's eligibility for, or ability to succeed in, the Program." The entire application and selection process could take up to a month.

I have discussed the above with A.U.S.A. Samuel Rothschild who has kindly consented to this adjournment request. Additionally, for the reasons stated above, as well as in the interests of justice, the defense consents to the exclusion of time under the Speedy Trial Act until the anticipated adjourn date.

Thank you.

Respectfully,

/s/ *Matthew J. Kluger*

Matthew J. Kluger, Esq.

Attorney for Angela Rodriguez

cc: AUSA Samuel P. Rothschild



The Young Adult Opportunity Program

The SDNY Young Adult Opportunity Program (YAOP) provides selected young adult defendants (ages 18-25) with intensive supervision by Pretrial Services and regular interaction with the supervising federal judges, Hon. Ronnie Abrams and Hon. Sarah Netburn. The Program provides these young adult defendants with structure and access to employment, counseling, and treatment resources. If they are successful, Program participants may receive a shorter sentence, a reduction or deferral of the charges filed against them, or nolle/dismissal of the charges entirely.

Graduates of the YAOP have continued to be positive and contributing members of their communities. Graduates have become EMTs, flight attendants, store managers and union laborers. They have continued their education, from obtaining their GED to enrolling in graduate school. They have purchased homes and started families. They have paid taxes, often for the first time. None of the Program participants has been re-arrested after graduating.

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of graduates who have been rearrested

All participants are charged with non-violent offenses.

Demographic	Active	Graduated
Men	18	21
Women	3	10
Financial Charges	13	18
Drug Charges	8	13

“Through YAOP, I was connected with the resources I desperately needed to turn my life around.”

- YAOP Grad

“One thing I’m really proud of is going back to school. I was out of school for 4 years but now I have that extra push from the Program, it is definitely great to have the encouragement and support I needed to start.”

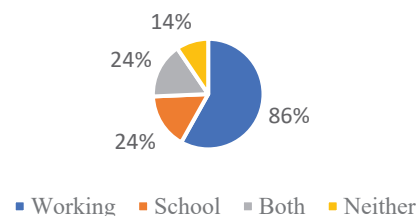
- YAOP Grad

“If it was not for this Program honestly speaking, I would’ve never launched my own clothing line or even believed that I could.”

- YAOP Grad

YAOP pushes every participant to enroll in school or be employed.

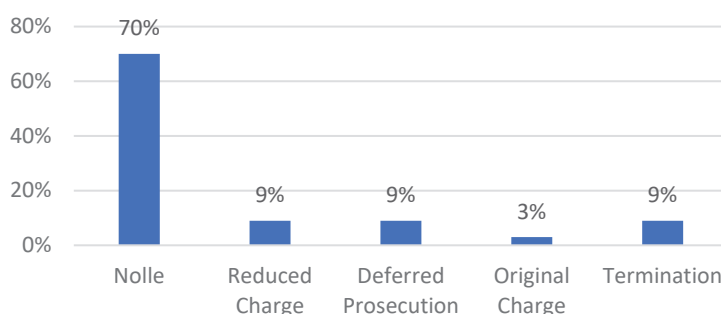
EMPLOYMENT & EDUCATION*



*Active participants

YAOP gives young adults a second chance.

YAOP Dispositions



“The program changed me as a person, I learned to be responsible and self-regulated.”

- YAOP Grad

For more information, please visit:

[Young Adult Opportunity Program | U.S District Court \(uscourts.gov\)](https://www.uscourts.gov/young-adult-opportunity-program)

March 25, 2021